

FRANCIS J. ROCHE
ATTORNEY AT LAW
538 UNION STREET

MEMBER OF NEW YORK AND MASSACHUSETTS BARS

HUDSON, NEW YORK 12534

TELEPHONE 518 828-4149

March 19, 2015

VIA ECF FILING

Hon. Robert E. Littlefield, Jr.
United States Bankruptcy Court
Northern District of New York
James T. Foley Courthouse
445 Broadway – Suite 300
Albany, NY 12207

Re: Susan Bohl v James Orefice – Adversary No. 14-90012-1-rel

Dear Judge Littlefield:

I represent adversary defendant James Orefice, and write this letter in response to the letter to your honor from William W. Frame dated March 18, 2015.

While forty five years as an attorney tells me that my opposing Mr. Frame's request for an adjournment is probably not going to meet with success, I am nevertheless opposing his request not only because my client deserves it but also because the system demands it.

Mr. Frame filed his notice of appearance on December 9, 2014, and by order filed January 8, 2015 all dispositive motions were to be made returnable on or before March 12, 2015.

On February 17, 2015 I filed my client's motion for summary judgment returnable March 12, 2015.

On February 28, 2015 Mr. Frame asked me to consent to a one week adjournment of the motion. I consented. On March 5, 2015 Mr. Frame asked for an additional week's extension. Again I consented. On March 16, 2015 Mr. Frame asked for a further extension. I did not consent, and thus his letter to your honor.

Whatever travails Mr. Frame is having, they are self-inflicted and almost certainly were foreseeable on December 9, 2014. Moreover, a review of the docket entries could readily bring

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Mr. Frame up to speed in opposing my client's motion. There are few, if any, facts in dispute, and only questions of law are involved.

The Bohl bankruptcy proceeding is just shy of five years old. I am not Mr. Vholes, Mr. Frame is not Mr. Kenge, and this proceeding is not Jarndyce v Jarndyce. It cannot go on forever.

Respectfully,

/s/ Francis J. Roche
Francis J. Roche

FJR/ep

c: William W. Frame, Esq.
James Kleinbaum, Esq.
Mark W. Swimelar, Esq.